

Exhibit 7

STATE OF MICHIGAN
MACOMB COUNTY CIRCUIT COURT

NATALIE REESER
Plaintiff,

v.

JEFFREY AUTOMOTIVE GROUP, LLC,
JEFFREY BUICK-NISSAN, INC.,
CHRISTINA BRIGGS, AND
CHRISTOPHER BROADNAX
Defendants.

09-1589-CD

CASE NO.: -CD

HON.:

DRUZINSKI
P-43507

Law Offices of Nanette L. Korpi, P.L.C.
Nanette L. Korpi, Esq. (P43049)
Attorney for Plaintiff
29820 Telegraph Road
Southfield, MI 48034
Tel: (248) 358-1747
Fax: (248) 358-4877



FILED
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CLERK OF COURT
MACOMB COUNTY, MICHIGAN

PLAINTIFF'S COMPLAINT AND JURY DEMAND

There is no other civil action between these parties arising out of the same transaction or occurrence as alleged in this Complaint pending in this Court, nor has any such action been previously filed and dismissed or transferred after having been assigned to a judge, nor do I know of any other civil action, not between these parties, arising out of the same transaction or occurrence as alleged in this Complaint that is either pending or was previously filed and dismissed, transferred or otherwise disposed of after having been assigned to a judge in this Court.

Now comes Plaintiff, Natalie Reeser, by and through her attorneys Law Offices of Nanette L. Korpi, P.L.C., and for this her Complaint states as follows:

I. JURISDICTIONAL AVERMENTS

1. Plaintiff is an individual who resides in Macomb County, Michigan and was employed by Defendant.

2. Defendant Jeffrey Automotive Group, L.L.C. is a Limited Liability Company which conducts business in Macomb County.
3. Defendant Jeffrey Buick-Nissan, Inc. is a Michigan Corporation which conducts business in Macomb County.
4. Defendant Christina Briggs is an individual who conducts business in Macomb County
5. Defendant Christopher Broadnax is an individual who conducts business in Macomb County.
6. Defendants conduct business in and are considered to reside in Macomb County and the events giving rise to this lawsuit occurred in whole or in part in Macomb County.
7. There is in excess of \$25,000.00 in controversy and venue and jurisdiction are appropriate in this Honorable Court.

II. FACTUAL AVERMENTS

8. Plaintiff Natalie Reeser was hired by Defendants to work as a Loan Officer/Special Finance Assistant to the Finance Manager Christina Briggs at the Jeffrey Dealership located at 30800 Gratiot Avenue Roseville Michigan 48066. (Defendants and the Dealership may here and after collectively be referred to as "Jeffrey").
9. Natalie Reeser received praise and compliments from the Finance Manager regarding her job performance.
10. Ms. Reeser has been asked out by a co-employee Christopher Broadnax. Mr. Broadnax had worked with Christina Briggs at a Fresard Dealership and was close

friends with Ms. Briggs. Mr. Broadnax sent Ms. Reeser personal text messages and personal e-mails, including photographs of his private parts. Ms. Reeser ultimately decided that she was not interested in pursuing a romantic relationship with Mr. Broadnax and began dating someone else.

11. After Ms. Reeser indicated that she was not interested in pursuing a romantic relationship with Mr. Broadnax he would make reports about Ms. Reeser to Christina Briggs.

12. Upon information and belief, Christopher Broadnax engaged in this conduct against Natalie Reeser in retaliation for her refusal to engage in a romantic relationship with him.

13. Ms. Reeser also found out that the Finance Manager Ms. Briggs would make it a practice to falsify documents to be submitted to banks and lending institutions to receive loans for customers.

14. There was an incident where Christina Briggs requested Ms. Reeser to work on altering a phone bill that could be submitted on behalf of a perspective customer to a bank to get loan approval.

15. Ms. Reeser declined to alter the document.

16. Ms. Briggs then had another employee alter the document in Ms. Reeser's presence.

17. The ostensible reason for the termination of Ms. Reeser's employment was her posting of an ad on Craig's List during work hours.

18. Jeffrey employees were not disciplined for being on the Internet and any company policy regarding Internet usage was not enforced.

COUNT I – TERMINATION OF EMPLOYMENT AND VIOLATION OF PUBLIC POLICY

19. Plaintiff reincorporates and realleges the statements made in paragraphs one through sixteen as though fully stated herein.

20. Defendant's agent Christina Briggs requested that Plaintiff violate various laws, including, state and federal laws, by altering financial documents to be submitted to lending institutions in order to receive approval on loans on behalf of Jeffrey customers.

21. Natalie Reeser declined or refused to participate in violating these laws.

22. The declination or refusal of Natalie Reeser to engage in a violation of laws by altering financial documents was a determinative factor in the Defendants' decision to terminate the employment relationship of Natalie Reeser. Defendants actions in termination the employment of Natalie Reeser in violation of public policy has caused Natalie Reeser to sustain damages including, but not necessarily limited to, loss of wages, loss of future wages, loss of benefits, loss of future benefits, loss of opportunities for advancement or promotion, emotional distress, exemplary damages, costs and attorneys fees.

WHEREFORE, Plaintiff Natalie Reeser respectfully requests that this Honorable Court enter a judgment against Defendants Jeffrey Automotive Group, L.L.C. and Jeffrey Buick-Nissan, Inc. in an amount in excess of \$25,000.00 as well as her costs interest and attorneys fees.

COUNT II – TORTIOUS INTERFERENCE WITH CONTRACTUAL AND/OR BUSINESS RELATIONSHIP – CHRISTINA BRIGGS AND CHRISTOPHER BROADNAX

23. Plaintiff reincorporates and realleges the statements made in paragraphs one through twenty-two as though fully stated herein.

24. Plaintiff Natalie Reeser had a contractual relationship with Defendants Jeffrey Automotive Group, L.L.C. and Jeffrey Buick-Nissan, Inc. and/or had a valid business relationship or expectancy.
25. Defendants Christopher Broadnax and Christina Briggs had knowledge of Plaintiff Natalie Reeser's relationship with Defendants Jeffrey Automotive Group, L.L.C. and Jeffrey Buick-Nissan, Inc.
26. Defendants Christopher Broadnax and/or Christina Briggs unjustifiably instigated Defendants Jeffrey Automotive Group, L.L.C. and Jeffrey Buick-Nissan, Inc. to breach Natalie Reeser's contractual and/or business relationship with Defendants Jeffrey Automotive Group, L.L.C. and Jeffrey Buick-Nissan, Inc.
27. The instigation of the breach by Christopher Broadnax was unjustified or wrongful in that it was motivated, in whole or in part, by the improper purpose of seeking the termination of Natalie Reeser's employment relationship with Defendants Jeffrey Automotive Group, L.L.C. and Jeffrey Buick-Nissan, Inc. based, in whole or in part, upon Natalie Reeser's rejection of Christopher Broadnax's romantic and/or sexual advances.
28. Christina Brigg's instigation of the breach in Natalie Reeser's employment relationship with Defendants Jeffrey Automotive, L.L.C. and Jeffrey Buick-Nissan, Inc. was wrongful in that it was motivated, in whole or in part, by Natalie Reeser's refusal to engage in falsifying documents in order to obtain loans as requested by Christina Briggs.
29. Natalie Reeser had reason to expect that her relationship with Defendants Jeffrey Automotive, L.L.C. and Jeffrey Buick-Nissan, Inc. would continue absent

Defendants Christopher Broadnax and/or Christina Briggs interference with the relationship and she has sustained tangible damages including, but not necessarily limited to, loss of wages, loss of benefits, loss of opportunities for advancement, emotional distress, exemplary damages, costs and attorneys fees.

WHEREFORE, Plaintiff Natalie Reeser respectfully requests this Honorable Court enter a judgment against Defendants Christopher Broadnax and/or Christina Briggs in an amount in excess of \$25,000.00, as well as her costs interests and attorneys fees.

Respectfully submitted,
Law Offices of Nanette Korpi, P.L.C.
By: _____

Nanette L. Korpi, Esq. (P43049)
29820 Telegraph Road
Southfield, Michigan 48034
248-358-1747

Dated: April 2, 2009